

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

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| | X | |
| In re: | : | Chapter 11 |
| | : | |
| BARRETTS MINERALS INC., <i>et al.</i> , ¹ | : | Case No. 23-90794 (DRJ) |
| | : | |
| Debtors. | : | (Jointly Administered) |
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| | X | |
| | : | |
| BARRETTS MINERALS INC., <i>et al.</i> , | : | |
| | : | |
| Plaintiffs, | : | Adv. Pro. No. _____ |
| | : | |
| v. | : | |
| | : | |
| THOSE PARTIES LISTED IN APPENDIX A TO | : | |
| COMPLAINT and JOHN AND JANE DOES 1- | : | |
| 1000, ² | : | |
| | : | |
| Defendants. | : | |
| | : | |
| | X | |

**DEBTORS’ ADVERSARY COMPLAINT FOR
DECLARATORY AND INJUNCTIVE RELIEF**

The above-captioned debtors and debtors in possession (collectively, the “**Debtors**”) in these chapter 11 cases (these “**Chapter 11 Cases**”) and plaintiffs in the above-captioned adversary proceeding, bring this complaint (the “**Complaint**”) seeking (a) a declaration that the automatic stay under section 362 of title 11 of the United States Code (the “**Bankruptcy Code**”) applies and

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: Barretts Minerals Inc. (8715) and Barretts Ventures Texas LLC (0787). The Debtors’ address is 5605 North MacArthur Boulevard, Suite 1000, PMB 139, Irving, Texas 75038.

² A list of the named Defendants, who are plaintiffs in the Talc Actions (as defined below), is set forth in Appendix A to this Complaint. Those Defendants and Jane and John Does 1-1000 shall be referred to herein as the “**Talc Claimants**” or “**Defendants**.”

extends to prohibit the continued prosecution of, expansion of, or the filing of any additional, Covered Actions (as defined herein) as against the BMI Affiliates (as defined herein), or, in the alternative, (ii) an injunction preventing the continued prosecution of, expansion of, or the filing of any additional, Covered Actions pursuant to section 105 of the Bankruptcy Code during the pendency of these Chapter 11 Cases, and state as follows:

INTRODUCTION

1. The Debtors have commenced this adversary proceeding pursuant to Rules 7001(7), 7001(9), and 7065 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”) and sections 105(a) and 362(a) of the Bankruptcy Code seeking declaratory and injunctive relief. By virtue of the Debtors’ voluntary petitions under chapter 11 of the Bankruptcy Code having been filed in this Court, the actions identified in Exhibit A to this Complaint (the “**Talc Actions**”) are stayed against the Debtors pursuant to section 362 of the Bankruptcy Code. But to realize the intended benefit of the stay and enable the Debtors to pursue their reorganization objectives for these Chapter 11 Cases, the Debtors need and therefore seek additional relief.

2. The Debtors first seek an order declaring that the automatic stay applies and extends to prohibit the continued prosecution of the Talc Actions, the addition as parties to any Talc Actions, and the filing of any new actions during the pendency of these Chapter 11 Cases that in any way relate to or arise out of the talc mined, beneficiated, processed, or sold by Debtor Barretts Minerals Inc. (“**BMI**”) (together with the Talc Actions, the “**Covered Actions**”) as against Minerals Technologies Inc. (“**MTI**”), Specialty Minerals Inc. (“**SMI**”), and any other non-debtor subsidiaries of MTI (together with MTI and SMI, the “**BMI Affiliates**”). In the alternative, the Debtors seek an injunction pursuant to section 105 of the Bankruptcy Code enjoining the continued

prosecution of, addition as parties to, or filing of any additional, Covered Actions as against the BMI Affiliates for the pendency of these Chapter 11 Cases.

3. The relief requested herein is necessary to safeguard and avoid irreparable harm to the estates, ensure the integrity and purpose of the automatic stay are preserved, and enable the Debtors to pursue their reorganization objectives.

4. Contemporaneous with the filing of this Complaint, the Debtors are also filing an *Emergency Motion for (I) an Order (A) Declaring that the Automatic Stay Prohibits Certain Actions Against Non-Debtors or, in the Alternative, (B) Preliminarily Enjoining Such Actions Pursuant to 11 U.S.C. § 105, and (II) a Temporary Restraining Order Enjoining Certain Actions Against Non-Debtors* (the “**Motion**”), which requests the relief sought herein on an expedited timeframe.

JURISDICTION AND VENUE

5. This adversary proceeding arises in and relates to the Debtors’ cases pending before this Court under chapter 11 of the Bankruptcy Code.

6. The Court has jurisdiction to consider this adversary proceeding pursuant to 28 U.S.C. § 1334.

7. The Court has subject matter jurisdiction over the claims against the Debtors and the BMI Affiliates pursuant to 28 U.S.C. § 1334. Arising under and arising in jurisdiction exist over this action because this Complaint seeks to clarify the extent of the automatic stay and extend the automatic stay to non-debtor BMI Affiliates. Related-to jurisdiction exists over the claims against non-debtor BMI Affiliates because (i) the Debtors and the BMI Affiliates share an identity of interest, (ii) the Debtors would face the risk of being bound or prejudiced by multiple determinations of factual and legal issues if the Covered Actions as against the BMI Affiliates are

not stayed, and (iii) continued prosecution of the Covered Actions would divert critical estate resources from the Debtors' reorganization efforts.

8. This adversary proceeding is a core proceeding under 28 U.S.C. § 157(b) and, pursuant to Bankruptcy Rule 7008 and Rule 7008-1 of the Bankruptcy Local Rules for the Southern District of Texas (the "**Bankruptcy Local Rules**"), the Debtors consent to the entry of a final order by the Court in connection with this adversary proceeding to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

9. Venue for this matter is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409.

BASIS FOR RELIEF

10. The statutory bases for the relief requested herein are sections 362(a) and 105(a) of the Bankruptcy Code and section 2201(a) of title 28 of the United States Code.

11. The Debtors have commenced this adversary proceeding pursuant to Bankruptcy Rules 7001(7), 7001(9), and 7065.

12. The Debtors have made no prior request for the relief requested herein to this or any other court.

THE PARTIES

13. BMI is a company organized under the laws of the state of Delaware. BMI has been involved in the mining, beneficiating, processing, and sale of talc since 1992. BMI is a wholly-owned subsidiary of SMI, which in turn is a wholly-owned subsidiary of MTI. Debtor Barretts Ventures Texas LLC is a wholly-owned subsidiary of BMI that owns and manages certain real property.

14. Each named defendant listed as a plaintiff in Appendix A to this Complaint is a current plaintiff in a Talc Action against BMI or the BMI Affiliates seeking either damages or both damages and injunctive relief, all of which are based on alleged exposure to talc.

15. Each of defendants Jane and John Does 1-1,000 is a prospective plaintiff who may, at any time during the pendency of these Chapter 11 Cases, commence or seek to commence an action to pursue a claim against the BMI Affiliates in connection with alleged exposure to talc produced, distributed, tested, and/or sold by BMI.

FACTUAL BACKGROUND

I. The Debtors' Corporate Structure, Operations, And History

A. The Debtors and the BMI Affiliates

16. BMI is a wholly-owned subsidiary of SMI, which is in turn a wholly-owned subsidiary of MTI.³ BVT is a wholly-owned subsidiary of BMI. BMI's current operations primarily focus on the mining, beneficiating, processing, and sale of industrial talc. BMI supplies talc to distributors and third-party manufacturers for use in such parties' products, which are then sold to consumers. BMI does not manufacture any final products containing talc or sell such products directly to consumers. Aside from BMI's talc business, the Debtors own and manage certain real property holdings that provide a consistent stream of rental income. BMI owns the full value chain of its talc operations, from mining to milling and processing to packaging, which allows BMI to produce the highest quality talc. The end product of BMI's talc value chain is high-quality processed and packaged talc that is either shipped to customers and distributors, or stored.

³ Additional background information in connection with the Debtors and the Chapter 11 Cases is available in the *Declaration of David J. Gordon, Chief Restructuring Officer of the Debtors, in support of Chapter 11 Petitions and First Day Pleadings* [Docket No. 13].

The BMI Affiliates do not mine, process, beneficiate, or package any talc.⁴ All such mining, processing, beneficiating, or packaging of talc is performed by BMI.

B. History and Corporate Structure of BMI

17. BMI's talc operations were historically part of an unincorporated division of Pfizer Inc. ("**Pfizer**"). On August 7, 1992, BMI was incorporated as a wholly-owned subsidiary of Pfizer. In 1992, Pfizer sought to divest its minerals businesses. To effectuate the separation, Pfizer undertook a number of restructuring transactions whereby MTI was reorganized from a wholly-owned subsidiary of Pfizer to an independent company owning, through its subsidiaries, Pfizer's specialty minerals businesses. The restructuring transaction was implemented in several parts. On September 28, 1992, MTI and Pfizer entered into a Reorganization Agreement (the "**Reorganization Agreement**"), pursuant to which Pfizer conveyed, among other things, the stock of SMI, BMI, and certain other subsidiaries to MTI. In connection with the Reorganization Agreement, Pfizer transferred to BMI, as a capital contribution, certain assets used in the business of mining, processing, and selling talc. The transfer was made pursuant to that certain Asset Contribution Agreement, dated September 28, 1992 by and between Pfizer and BMI. Pfizer also consummated certain other transactions to transfer its remaining non-talc specialty minerals assets to MTI or one of its subsidiaries other than BMI. Subsequent to transferring the assets and equity interests related to its specialty minerals businesses to MTI and its subsidiaries, on October 23, 1992 (the "**Reorganization Date**"), Pfizer took MTI public via an initial public offering. MTI has remained the direct parent of SMI and the indirect parent of BMI since the Pfizer reorganization.

⁴ From 1992 to 2007, Analytical Services Group, a testing service housed at SMI, performed all asbestos testing on BMI talc. No regulated asbestiform minerals were detected.

18. Pursuant to the Reorganization Agreement and related documents, Pfizer and its affiliates Pfizer Ltd. and Pfizer S.A. (the “**Pfizer Entities**”) agreed to indemnify MTI for certain liabilities, damages, and expenses. Specifically, the Reorganization Agreement provides that Pfizer shall, or shall cause the Pfizer Entities to, indemnify and hold MTI harmless on a net after tax basis from and against “[a]ny and all liabilities, obligations, damages and expenses” (other than attorney’s fees) that “arise from . . . any product liability lawsuits or claims now pending or brought at any time in the future to the extent they allege damages or injury from the use or handling of, or exposure to, any product sold by the Business prior to the Reorganization Date” (the “**Pfizer Indemnity**”). The Reorganization Agreement was amended by a Letter Agreement, dated as of October 29, 1992 (the “**Letter Agreement**”), which, among other things, expanded Pfizer’s indemnification obligations to include MTI’s subsidiaries (including BMI). Nothing in either the Reorganization Agreement or the Letter Agreement obligates BMI to indemnify Pfizer for any claims or liabilities.

C. Shared Services

19. MTI and SMI provide the Debtors with critical operational services through a shared services arrangement. The shared services arrangement between BMI, SMI and MTI was formalized in the Services Agreement, among MTI, SMI, and BMI, dated as of June 19, 2023, and effective as of January 1, 2023 (the “**Initial Shared Services Agreement**”). The Initial Shared Services Agreement was amended on September 28, 2023 (the “**Shared Services Amendment**”) and, together with the Initial Shared Services Agreement, the “**BMI Shared Services Agreement**”). Although the shared services arrangement was formalized in 2023, the BMI Shared Services Agreement documented the pre-existing shared services relationship between BMI and the BMI Affiliates.

20. Provision of the Shared Services with respect to BVT is governed by that certain Services Agreement, by and among MTI, SMI, BMI, and BVT, dated as of September 28, 2023 (as may be amended or supplemented, the “**BVT Shared Services Agreement**” and, together with the BMI Shared Services Agreement, the “**Shared Services Agreements**”). Pursuant to the BVT Shared Services Agreement, BVT receives shared services from MTI, SMI, and BMI.

21. Through the Shared Services Agreements, the Debtors and the BMI Affiliates share executive services, financial and general business services, information technology services, human resource services, legal services, supply chain services, facility services, testing services, sales and marketing services, research and development services, and other general administrative services. As part of the arrangement, executives and employees at the BMI Affiliates devote part of their time to the operations and service of the Debtors. Due to the shared services arrangement, there is overlap in each entity’s resources, and employees of the BMI Affiliates often perform work on behalf of BMI.

D. The BMI Indemnity Agreement

22. On September 28, 2023, BMI, on the one hand, and MTI and SMI on the other hand, entered into that certain Indemnity Agreement (the “**BMI Indemnity Agreement**”), pursuant to which BMI agreed to indemnify, defend and hold harmless the BMI Affiliates for any Losses (as defined in the BMI Indemnity Agreement) arising directly or indirectly from (i) Indemnitor Liabilities⁵ and (ii) reimbursement or other obligations of the BMI Affiliates under or in respect of any appeal bonds or similar litigation-related surety contracts that are or have been posted or entered into, or that may in the future be posted or entered into, by the BMI Affiliates in

⁵ “Indemnitor Liabilities” is defined in the BMI Indemnity Agreement as “any Liabilities related in any way to (i) Indemnitor Assets or (ii) alleged conduct of or failures to act by Indemnitor, including, without limitation, any such conduct or failures to act relating to products mined or sold by Indemnitor.” “Indemnitor Assets” is defined in the BMI Indemnity Agreement as “any assets at any time owned or operated by Indemnitor.”

connection with proceedings in respect of or related to any Indemnitor Liabilities (the “**BMI Indemnity**”). BMI’s obligations under the BMI Indemnity are subject to a cap—*i.e.*, the lesser of (x) the value as of the Indemnity Effective Time (as defined in the BMI Indemnity Agreement) of the Indemnitor’s assets; and (y) the obligations under the MTI Credit Agreement.⁶

23. The BMI Indemnity was provided to the BMI Affiliates in exchange for the (i) release of BMI from its obligations under the MTI Financing Agreements—under which substantially all of BMI’s assets were pledged as security (the “**Release Transaction**”); (ii) maintenance of certain surety bonds in respect of BMI’s operations; (iii) continuation of insurance coverage to BMI and BVT, at the same level of insurance in place as of the date of the BMI Indemnity Agreement; (iv) prepayment by MTI or SMI of up to \$1.2 million on account of certain amounts owed to employees, utilities, and vendors critical to BMI’s operations, without any corresponding repayment obligations; and (v) cooperation with the transfer of certain intellectual property assets used in BMI’s talc business to a purchaser in connection with the sale of all or substantially all of such business.

24. The BMI Indemnity Agreement provides significant benefits to BMI. First, it reduces the complexity and associated expense of the sale of BMI’s assets (the “**Sale**”) and the Chapter 11 Cases as a result of the Release Transaction. Previously, BMI’s obligations under the MTI Credit Agreement were secured by substantially all of the assets of BMI. Without the benefit

⁶ BMI was previously (i) a guarantor under that certain Indenture, dated as of June 30, 2020, among MTI, the Guarantors from time to time parties thereto and The Bank of New York Mellon Trust Company, N.A., as Trustee (the “**MTI Indenture**”), relating to MTI’s 5.000% Senior Notes due 2028, and (ii) a direct obligor under that certain Credit Agreement, dated as of May 9, 2014 (as amended by the Refinancing Facility Agreement, dated as of June 23, 2015, the Second Amendment, dated as of February 14, 2017, the Third Amendment and Incremental Facility Amendment, dated as of April 18, 2018 and the Refinancing Facility Agreement, dated as of August 11, 2022, and as otherwise amended, amended and restated, supplemented or otherwise modified prior to the date hereof, the “**MTI Credit Agreement**” and together with the MTI Indenture, the “**MTI Financing Agreements**”), among MTI, the Borrowing Subsidiaries party thereto, the Lenders party thereto, JPMorgan Chase Bank, N.A., as Administrative Agent, and the other agents party thereto.

of the Release Transaction and BMI's designation as an "Unrestricted Subsidiary" under the MTI Financing Agreements, the Debtors may have faced significant hurdles in respect of the Sale and their decision to commence the Chapter 11 Cases. Rather than enter into bankruptcy with hundreds of millions of dollars of secured debt and publicly-traded notes obligations, the Release Transaction resulted in a dramatic reduction of BMI's secured and unsecured obligations and eliminated significant potential objectors to the goals the Debtors seek to achieve in the Chapter 11 Cases. Second, BMI obtained assurance of both insurance coverage and surety bond availability at no cost to BMI. Third, BMI ensured the prepayment of certain expenses critical to its operations in advance of any filing, further smoothing its transition into bankruptcy, and with no parallel repayment obligation to MTI. Finally, MTI agreed to transfer—and bear the costs to transfer—certain intellectual property used in BMI's talc business to a purchaser in connection with the sale or potential sale of all or substantially all of BMI's talc business.

II. Talc Litigation

A. The Talc Claims and Historical Settlement of Talc Claims

25. BMI is facing significant potential liabilities as a result of hundreds of claims brought by plaintiffs primarily alleging personal injuries caused by exposure to talc allegedly contaminated with asbestos that was mined, beneficiated, processed, and sold by BMI (the "**Talc Claims**"). As of the Petition Date, BMI and certain BMI Affiliates have been sued in over 880 cases asserting Talc Claims.

26. Prior to 2018, BMI had been sued in only 14 lawsuits alleging Talc Claims. In 2018 and 2019, plaintiffs began filing Talc Claims at an increasing pace, rising to 18 in 2018 and 48 in 2019. The number of claims increased to 93 in 2020, 169 in 2021, and 205 in 2022. As of the Petition Date, there are approximately 555 pending Talc Claims. No cases alleging Talc Claims against BMI have gone to trial.

27. Historically, Pfizer had settled Talc Claims and obtained releases for BMI and the BMI Affiliates, given Pfizer's indemnification obligations under the Reorganization Agreement. When BMI and/or a BMI Affiliate was named in a lawsuit that alleged pre-Reorganization Date exposure to talc, the claim would be tendered to and typically independently resolved by Pfizer. However, a dispute has arisen with Pfizer with respect to the scope of its indemnity obligations under the Reorganization Agreement, and Pfizer has recently begun to unilaterally settle certain actions without obtaining a release for BMI or the BMI Affiliates, leaving BMI and the BMI Affiliates to settle such actions at inflated values. Prior to 2022, BMI had settled no Talc Claims with plaintiffs directly. Since 2022, BMI has settled 24 Talc Claims with plaintiffs directly.

B. The Talc Actions

28. The Talc Actions are those pending actions in which one or more of the BMI Affiliates have been named as defendants. The allegations at the core of the Talc Actions are the same as the Talc Claims generally. The BMI Affiliates are alleged to be liable in connection with their relationship to, dealings with, and/or the operations of BMI, and generally, claimants do not draw a distinction as between claims and allegations against BMI and those against the BMI Affiliates. Indeed, the Talc Actions do not typically allege individual injury separate and distinct from the generalized talc-related injuries allegedly suffered by all talc claimants. As a result, it is the Debtors' view that the Covered Actions, including the already-filed Talc Actions, implicate the BMI Indemnity under the Indemnification Agreement.

29. Because the allegations and injuries from the Talc Actions stem from plaintiffs' alleged exposure to talc and BMI is the only entity within the BMI Affiliates' corporate structure that mined, beneficiated, processed, and distributed talc, the Debtors believe there is a risk that collateral estoppel, *res judicata*, or record taint could occur should Covered Actions proceed against the BMI Affiliates. The Debtors therefore anticipate that BMI would need to participate

in the Talc Actions and other Covered Actions to protect itself against the risk of prejudicial preclusive legal or evidentiary findings. This presents an immediate risk, given that certain Talc Actions have looming filing deadlines, discovery obligations, and critical hearings in the coming days and weeks. Cases in which currently assigned trial dates have been set could proceed as soon as October 16, 2023. The Debtors estimate that participating in Covered Actions would result in substantial legal expenses and divert key resources from the Debtors' reorganization efforts, such that it would adversely affect those reorganization efforts.

30. Discovery in Covered Actions is also expected to be burdensome on BMI and divert the Debtors' resources away from their reorganization efforts. It is anticipated that discovery in the Covered Actions would require document discovery and testimony from BMI's employees and employees of the BMI Affiliates who provide critical services to the Debtors, which would require them to devote substantial time and attention to the Covered Actions. And even if the discovery is directed at the BMI Affiliates instead of BMI, the Debtors expect that discovery would still burden the estates because the Debtors and the BMI Affiliates share services, thus a drain on the BMI Affiliates would negatively impact the Debtors.

C. The Chapter 11 Filing

31. The Debtors' decision to commence these Chapter 11 Cases was prompted by the growing number of Talc Claims, coupled with: (i) an increase in settlement demands with respect to Talc Claims; (ii) the unavailability of insurance coverage due to allegations of asbestos contamination; (iii) the unwillingness of Pfizer, despite its contractual indemnification obligations, to provide comprehensive indemnification for BMI's mounting potential liability exposure; and (iv) an anticipated increase in the number of Talc Claims that are not covered by insurance or indemnification.

32. The primary purpose of the Chapter 11 Cases is to address and comprehensively resolve BMI's liabilities arising from talc. The Debtors intend to achieve this goal by continuing to negotiate—and ultimately confirming—a plan of reorganization pursuant to sections 524(g) and 1129 of the Bankruptcy Code that creates a section 524(g) trust vested with substantial assets for the benefit of current and future talc claimants and provides for a channeling injunction prohibiting claimants from asserting claims arising from BMI's talc prior to its emergence from the Chapter 11 Cases against the Debtors or any BMI Affiliate.

33. Prior to the Petition Date, BMI took steps to further its reorganization purpose. These steps included among other things, (i) entering into nondisclosure agreements with The Gori Law Firm; Maune Raichle Hartley French & Mudd, LLC; Weitz & Luxenberg P.C.; and Simon Greenstone Panatier, PC (collectively, the “**Ad Hoc Plaintiffs’ Group**”) to facilitate negotiations regarding the possibility of a pre-arranged chapter 11 filing; (ii) engaging in substantial prepetition diligence and negotiations with the Ad Hoc Plaintiffs’ Group and its legal counsel and financial analyst (both of whom were engaged at BMI's expense); (iii) engaging Sander Esserman of Stutzman, Bromberg, Esserman & Plifka, P.C. as the prepetition future claimants’ representative (the “**Prepetition FCR**”) to represent the interests of individuals who may in the future assert talc-related demands against BMI; (iv) engaging in a diligence process and constructive dialogue with the Prepetition FCR and his legal counsel and claims analyst (who were also engaged at BMI's expense); and (v) entering into a debtor-in-possession financing agreement to finance the Debtors through the Chapter 11 Cases. The Debtors are of the view that they have made substantial progress towards positioning themselves for a successful reorganization.

THE NEED FOR THE REQUESTED RELIEF

34. The Debtors commenced these Chapter 11 Cases to equitably and permanently resolve all current and future talc-related claims against them through the consummation of a plan

of reorganization that includes the establishment of a trust under section 524(g) of the Bankruptcy Code. The declaratory and injunctive relief sought by this adversary proceeding (and the related Motion) is critical to the Debtors' ability to achieve that purpose.

35. Allowing the Talc Claimants to continue or commence Covered Actions against any of the BMI Affiliates, while the Debtors simultaneously attempt to resolve the identical underlying claims in this bankruptcy proceeding pursuant to the requirements of section 524(g) of the Bankruptcy Code would (a) defeat the very purpose of the Debtors' bankruptcy cases, (b) result in irreparable harm to the Debtors' estates, (c) undermine and circumvent the purposes and spirit of the automatic stay, and (d) divert the Debtors from their reorganization efforts.

A. The Covered Actions Would Impose a Substantial Risk of Additional Liquidated Claims Against BMI's Estate.

36. Absent a stay during the Chapter 11 Cases, there is a substantial risk that the Covered Actions would result in additional liquidated claims against BMI's estate. Because the Covered Actions arise out of the assets or conduct of BMI, BMI's indemnification obligations to the BMI Affiliates are implicated in the Covered Actions. As such, continuation of the Covered Actions against the BMI Affiliates creates a substantial risk of BMI incurring significant indemnification obligations to the BMI Affiliates, which would result in additional liquidated claims against BMI's estate.

B. The Covered Actions Would Immediately and Adversely Affect the Debtors' Estates.

37. Absent a stay of Covered Actions against the BMI Affiliates during the Chapter 11 Cases, the Debtors' estates would suffer immediate adverse consequences.

38. It is expected that should the Covered Actions continue against the BMI Affiliates, BMI would be compelled to participate in the Covered Actions because BMI believes there is a risk that collateral estoppel, *res judicata*, or record taint could occur to the detriment of BMI.

39. It is also expected that discovery in the Covered Actions will largely seek discovery of BMI or of individuals at the BMI Affiliates who perform services on behalf of BMI under the BMI Shared Services Agreement. Even if discovery is not directed explicitly at BMI, it is anticipated that discovery in the Covered Actions would be a substantial burden on the Debtors. BMI shares services with the BMI Affiliates, meaning employees of the BMI Affiliates provide key services to BMI. Thus, should discovery in the Covered Actions be targeted at the BMI Affiliates, the drain on the time and resources of the BMI Affiliates will negatively impact the Debtors.

40. BMI estimates that its involvement in the Covered Actions due to the foregoing reasons would necessarily result in BMI incurring substantial legal expenses. Indeed, the Debtors are operating under a finite amount of debtor-in-possession financing and the incurrence of these substantial legal expenses would result in the siphoning of resources from their operations or reorganization efforts.

NATURE OF THE RELIEF REQUESTED

41. To guard against the irreparable harm that the Debtors would suffer in the event that the Talc Claimants are permitted to continue or commence Talc Claims against the BMI Affiliates during the Chapter 11 Cases, the Debtors seek an order: (i) declaring the automatic stay under section 362 of the Bankruptcy Code applies and extends to prohibit the continued prosecution of, expansion of, or the filing of any additional, Covered Actions as against the BMI Affiliates, or, in the alternative, (ii) enjoining the continued prosecution of, expansion of, and the filing of any additional, Covered Actions pursuant to section 105 of the Bankruptcy Code during the pendency of these Chapter 11 Cases.

COUNT I
DECLARATORY RELIEF PURSUANT TO
SECTION 362(a)(3) OF THE BANKRUPTCY CODE
(Against All Defendants)

42. The Debtors incorporate by reference all preceding paragraphs as if fully set forth herein.

43. Section 362(a)(3) of the Bankruptcy Code operates as a stay, “applicable to all entities,” of “any act to obtain possession of property of the estate or of property from the estate or to exercise control over property of the estate.”

44. Section 541 of the Bankruptcy Code provides that the filing of a chapter 11 petition “creates an estate . . . comprised of . . . all legal or equitable interests of the debtor in property as of the commencement of the case.” 11 U.S.C. § 541(a).

45. BMI’s right to recover under the Pfizer Indemnity is property of the Debtors’ estates and continued prosecution of the Covered Actions against the BMI Affiliates threatens to negatively impact the Debtors’ recovery under the Pfizer Indemnity. Thus, the Covered Actions are stayed under section 362(a)(3) of the Bankruptcy Code because continued prosecution of the Covered Actions as against the BMI Affiliates constitutes an act to control property of the Debtors’ estates.

COUNT II
DECLARATORY RELIEF PURSUANT TO
SECTION 362(a)(1) OF THE BANKRUPTCY CODE
(Against All Defendants)

46. The Debtors incorporate by reference all preceding paragraphs as if fully set forth herein.

47. Section 362(a)(1) of the Bankruptcy Code operates as a stay, “applicable to all entities,” against “the commencement or continuation . . . of a judicial, administrative, or other action or proceeding against the debtor that was or could have been commenced before the

commencement of the case under this title, or to recover a claim against the debtor that arose before the commencement of the case under this title.”

48. Unusual circumstances exist meriting an extension of the stay to the BMI Affiliates in the Covered Actions because the BMI Affiliates and the Debtors share an identity of interest such that a judgment against the BMI Affiliates in the Covered Actions will, in effect, be a judgment against the Debtors. Such actions would therefore fall within the prohibition against “the commencement or continuation . . . of a judicial, administrative, or other action or proceeding . . . to recover a claim against the debtor that arose before the commencement of the case under this title.” 11 U.S.C. § 362(a)(1).

49. The Debtors and BMI Affiliates share an identity of interest sufficient to extend the automatic stay because (i) the claims asserted against the BMI Affiliates in the Covered Actions are (or will be) ultimately based on the conduct of BMI, such that those claims—even if ostensibly pursued against the BMI Affiliates—would essentially constitute claims against the Debtors within the meaning of section 362(a) of the Bankruptcy Code, and (ii) pursuit of the Covered Actions as against the BMI Affiliates implicates BMI’s indemnification obligations owed to the BMI Affiliates, thus converting such claims into claims against Debtor BMI.

50. Extension of the stay is further warranted because if the Covered Actions continue, are expanded to include, or are filed against the BMI Affiliates during the pendency of these Chapter 11 Cases, they would immediately and adversely impact the Debtors’ estates and reorganization because BMI would be compelled to participate in defending the allegations of the Covered Actions to avoid adverse, preclusive rulings and record taint. In addition, discovery and continued litigation of the Covered Actions would be a substantial burden on BMI and divert critical attention and estate resources from the Debtors’ reorganization efforts.

51. If the Covered Actions are permitted to continue, expand or be commenced against the BMI Affiliates, then the Debtors' prospects for confirming a plan of reorganization and establishing a trust under section 524(g) of the Bankruptcy Code could be impaired, thwarting the Congressional purpose of providing debtors with a breathing spell from litigation and other pressures to confirm a plan of reorganization.

52. The automatic stay should therefore be extended to the Covered Actions as against the BMI Affiliates.

COUNT III
INJUNCTIVE RELIEF PURSUANT TO SECTION 105(a)
OF THE BANKRUPTCY CODE
(Against All Defendants)

53. The Debtors repeat and reallege all preceding paragraphs as if fully set forth herein.

54. The Debtors alternatively seek an order pursuant to section 105(a) of the Bankruptcy Code, in furtherance of section 362 of the Bankruptcy Code, enjoining the Covered Actions as against the BMI Affiliates for the pendency of these Chapter 11 Cases, subject to extension by the Court.

55. Section 105(a) of the Bankruptcy Code authorizes and empowers this Court to issue any orders that will further the purposes and goals of the Bankruptcy Code, assist in the orderly and effective administration of the Chapter 11 Cases, aid in the preservation of the assets of the Debtors' estates, and aid in the formulation and confirmation of a chapter 11 plan that maximizes recovery to all of the Debtors' creditors.

56. Section 362(a)(1) of the Bankruptcy Code operates as a stay, "applicable to all entities," against "the commencement or continuation . . . of a judicial, administrative, or other action or proceeding against the debtor that was or could have been commenced before the

commencement of the case under this title, or to recover a claim against the debtor that arose before the commencement of the case under this title.”

57. Relief under section 105(a) of the Bankruptcy Code is proper in a chapter 11 case when necessary to protect a debtor’s ability to effectively reorganize and to preserve property of the debtor’s estate.

58. An order enjoining the Covered Actions as against the BMI Affiliates is essential to the Debtors’ reorganization efforts because the continuation of the Covered Actions against the BMI Affiliates will frustrate and jeopardize the Debtors’ effort to successfully reorganize.

59. An order enjoining the Covered Actions as against the BMI Affiliates would also preserve property of the Debtors’ estates, because such property would necessarily be expended in BMI’s participation (directly as a party or through discovery) in such actions were they to proceed.

60. An order enjoining the Covered Actions is proper here because the four requirements for injunctive relief are met.

61. First, the Debtors can demonstrate a substantial likelihood of succeeding on the merits in this action because unusual circumstances exist justifying the enjoining of the Covered Actions as against the BMI Affiliates. These unusual circumstances include the shared identity of interest between the BMI Affiliates and the Debtors. The Debtors and BMI Affiliates share an identity of interest because (i) the claims asserted against the BMI Affiliates in the Covered Actions are (or will be) ultimately based on the conduct of BMI, such that those claims—even if ostensibly pursued against the BMI Affiliates—would essentially constitute claims against the Debtors within the meaning of section 362(a) of the Bankruptcy Code, and (ii) pursuit of the Covered Actions as against the BMI Affiliates implicates BMI’s indemnification obligations owed

to the BMI Affiliates, thus converting such claims into claims against the Debtors. Unusual circumstances here also include the adverse impact continuation of the Covered Actions against the BMI Affiliates would have on the Debtors' estates and reorganization. BMI would be compelled to expend finite estate resources to participate in defending the allegations of the Covered Actions to avoid adverse, preclusive rulings and record taint. In addition, discovery and continued litigation of the Covered Actions would be a substantial burden on BMI and divert critical attention and estate resources from the Debtors' reorganization efforts. These reorganization efforts to date include, among other things, prepetition diligence and negotiation with key creditor constituencies, obtaining debtor-in-possession financing, and a robust prepetition marketing process, and support a likelihood that the Debtors will successfully reorganize.

62. Second, if the Covered Actions are not enjoined, the Debtors will suffer imminent and irreparable harm and their reorganization efforts will be threatened. This threat includes (i) the risk that claims will be liquidated against BMI's estate due to BMI's indemnification obligations; (ii) the risk of collateral estoppel, *res judicata* and record taint prejudicing BMI such that BMI would be forced to participate in the Covered Actions; and (iii) a significant drain on and diversion of BMI's limited resources that need to be focused on the Debtors' continued operations and reorganization.

63. Third, the likelihood of irreparable harm to the Debtors in the absence of injunctive relief far outweighs any harm to the Defendants. The Defendants will suffer little or no harm if the Covered Actions are enjoined because an injunction would merely pause the Covered Actions and not deprive the Defendants of an opportunity to pursue their claims. In contrast, such an injunction will advance the right of estate claimants (including those that might pursue the Covered Actions) to be equitably compensated through the Debtors focusing their efforts on successfully

pursuing confirmation of a plan creating a section 524(g) trust, rather than being dragged into value-destructive litigation.

64. Finally, the injunctive relief sought herein serves the public interest for two reasons. First, it would further the Congressional purpose behind the automatic stay of providing the Debtors with “a breathing spell.” Second, injunctive relief would support the Debtors’ efforts to reorganize, which furthers the Congressional purposes behind the Bankruptcy Code (including section 524(g)), *i.e.*, to provide a “fresh start” to companies beset with asbestos-related claims and to provide a just and equitable recovery for all holders of such claims. Accordingly, the injunctive relief the Debtors seek in this Complaint is appropriate and serves the public interest by promoting the orderly and effective administration of the Debtors’ estates.

WHEREFORE, for the foregoing reasons, the Debtors respectfully request entry of judgment (i) declaring the automatic stay under section 362 of the Bankruptcy Code applies and extends to prohibit the continued prosecution of, expansion of, or the filing of any additional, Covered Actions as against the BMI Affiliates, or, in the alternative, (ii) enjoining continued prosecution of, expansion of, or the filing of any additional, Covered Actions pursuant to section 105 of the Bankruptcy Code during the pendency of these Chapter 11 Cases.

Dated: October 9, 2023
Houston, Texas

Respectfully Submitted,

/s/ John F. Higgins

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Proposed Counsel for Debtors and Debtors in Possession

CERTIFICATE OF SERVICE

I certify that on October 9, 2023, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas on those parties registered to receive electronic notices.

/s/ John F. Higgins

John F. Higgins

Appendix A

| Claimant Name | Jurisdiction | Docket No./Case No. | Plaintiff's Counsel | Plaintiff's Counsel Mailing Address |
|--|---|---------------------|--|---|
| Acevedo, Yolando and Acevedo, Noe | Middlesex County, NJ | MID-L-003625-23 | Simone Greenstone Panatier, PC | 1201 Elm Street, Suite 3400 Dallas, TX 75270 |
| Alexander-Jones, G. Ruth and James R. Jones | King County, WA | 22-2-18669-1 SEA | Maune Raichle Hartley French & Mudd, LLC | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Anderson, Stephen & Robin | County of Los Angeles | 21STCV21966 | Deblase Brown Eyerly LLP | 680 South Santa Fe Ave. Los Angeles, CA 90021 |
| Antinori, Francis & Jane | St. Clair County, IL | 19-L-652 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Argo, Steve (Estate of) | Madison County, IL | 19-L-0851 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Arnot, James & Betty | St. Clair County, IL | 19-L-838 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Ashelford, Susan (Estate of John Ashelford) | Broward County, FL | 23-002556 CA27 | Simon Greenstone Panatier, P.C. | 1201 Elm Street, Suite 3400 Dallas, TX 75270 |
| Austin, Barbara and Michael | Middlesex County, NJ | MID-L-2486-22 | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Babbitt, Laraine, Individually and as Special Administrator to Decosta, Eileen (Estate of) | Madison County, IL | 20-L-1754 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Baird, Nilsa M. and Stanley | Middlesex County, NJ | MID-L-002175-22AS | Maune Raichle Hartley French & Mudd, LLC | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Bajo, Darrell & Jacqueline | Madison County, IL | 19-L-1502 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Baker, Tammy, Individually and as Special Adminstrator of Baker, Gary (Estate) | Madison County, IL | 19-L-688 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Baladejo, Maria Tatiana and Borst, Jurriaan | Twenty Second Judicial Circuit, City of St. Louis, MO | 2222-CC10118 | Menges Law, LLC | 6400 West Main Street, Suite 1G Belleville, IL 62223 |
| Ballesteros, Irma | County of Los Angeles, CA | 23STCV06710 | Frost Law Firm PC | 273 W 7th Street San Pedro, CA 90731 |
| Barker, George & Debra | Madison County, IL | 21-L-64 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Barnes, Timothy & Jackie | Madison County, IL | 20-L-1651 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Baron, Thomas | County of New York, NY | 190076/2022 | Belluck and Fox Law Firm | 546 5th Ave, 5th Floor New York, NY 10036 |
| Bartolo, Mona and Manuel | Ramsey County, MN | 62-CV-23-1660 | Simon Greenstone Panatier, P.C. | 1201 Elm Street, Suite 3400 Dallas, TX 75270 |
| Basili, Gina | Middlesex County, MA | 23-0784 | Shepard Law Firm | 160 Federal Street Boston, MA 2110 |
| Basser, Carol | Middlesex County, NJ | LCV2023355451 | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Bast, Donna and Bast, Larry | King County, WA | 23-2-15056-2SEA | Maune Raichle Hartley French & Mudd LLC | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Baxter, Judith, Individually and as Special Administrator of Baxter, James (Estate) | Madison County, IL | 20-L-606 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Beaudoin, Roger | Middlesex County, MA | 2181CV06632 | Thornton Law Firm | 84 State Street 4th Fl. Boston, MA 2109 |
| Bernatowicz, John & Joan (Estate of) | Madison County, IL | 19-L-785 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |

| Claimant Name | Jurisdiction | Docket No./Case No. | Plaintiff's Counsel | Plaintiff's Counsel Mailing Address |
|---|--|---------------------|--|--|
| Bezanilla, Bernadette & Leopoldo | Broward County, FL | 23-003072 | Maune Raichle Hartley French & Mudd, LLC | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Bisceglia, Janice | Middlesex County, NJ | MID-L-003853-21AS | Levy Konigsberg, LLP | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Blakey, Floyd & Valerie | St. Clair County, IL | 20-L-624 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Bloomberg, Ellen G. f/e/o Jac M. Bloomberg | Middlesex County, NJ | MID-L-2608-22 | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Blue, Kenneth & Terri | Madison County, IL | 2022LA1565 | Maune Raichle Hartley French & Mudd, LLC | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Blunnie, Elizabeth, Individually, and as Special Administrator of MOORE, Mary (Estate of) | Madison County, IL | 21-L-99 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Bolin, Ronnie | Madison County, IL | 19-L-1668 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Bowers, Bernard & Jeanne | Philadelphia Court of Common Pleas, PA | 210902481 | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Bowman, Elizabeth and Gary | County of Los Angeles, CA | 23STCV06876 | Simon Greenstone Panatier, P.C. | 1201 Elm Street, Suite 3400 Dallas, TX 75270 |
| Bradley, Jude (Sr.) & Donna | St. Clair County, IL | 20-L-163 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Braun, James Jr. | Madison County, IL | 22 LA 1010 | Maune Raichle Hartley French & Mudd, LLC | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Brinneman, Tyler & Aubrey | Middlesex County, NJ | MID-L-3541-19AS | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Britt, Dennis and Britt, Terri | Dallas County, Texas, TX | DC-23-06700 | Simon Greenstone Panatier, P.C. | 1201 Elm Street, Suite 3400 Dallas, TX 75270 |
| Broers, Kenneth and Genene | Madison County, IL | 20-L-1455 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Budge, Darryl | Middlesex County, MA | 2281CV02402 | Thornton Law Firm | 84 State Street 4th Fl. Boston, MA 2109 |
| Bumstead, John (Jr.) | St. Clair County, IL | 20-L-150 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Burch, Tesa Elaine (Estate of Dena Vee Powell, f/k/a Dena Burch) | County of New York, NY | 190122/2022 | Meirowitz & Wasserberg, LLP | 1040 Sixth Avenue, Suite 12B New York, NY 10018 |
| Burchette, Kimberly & Jamie | Middlesex County, NJ | MID-L-004582-22 | Levy Konigsberg, LLP | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Bus, Laura and Mark | Middlesex County, NJ | MID-L-003086-22 | Maune Raichle Hartley French & Mudd, LLC | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Casaravilla, Walter & Tammar | County of New York, NY | 190296/20 | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Cash, Gary D., Individually, and as Special Administrator of Cash, Gary W. (Estate of) | St. Clair County, IL | 19-L-903 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Cattani, Daniel | Madison County, IL | 20-L-1194 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Cavalluzzi, John and Renee | Middlesex County, NJ | MID-L-002519-22 | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Chagolla, Thomas & Linda | St. Clair County, IL | 20-L-157 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Chica, Juan Silva Perez and Silva, Rebeca | County of Los Angeles, CA | 23STCV06756 | Simon Greenstone Panatier, P.C. | 1201 Elm Street, Suite 3400 Dallas, TX 75270 |

| Claimant Name | Jurisdiction | Docket No./Case No. | Plaintiff's Counsel | Plaintiff's Counsel Mailing Address |
|---|---|---------------------|---|---|
| Cinelli, Carlotta, Individually, and as Special Administrator of Andrade, John (Estate of) | St. Clair County, IL | 20-L-0365 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Clifton, Rejeana, Individually, and as Executor of Clifton, James (Estate of) | Middlesex County, NJ | MID-L-3946-21AS | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Clugston, David | St. Clair County, IL | 20-L-131 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Cody, Laura and William | Nassau, NY | 603356/2022 | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Colemenero, Margarita | County of Los Angeles, CA | 23STCV11921 | Dean Omar Branham Shirley, LLP | 302 N Market Street, Suite 300 Dallas, TX 75202 |
| Collins, James & Sanalyn | St. Clair County, IL | 20-L-160 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Conti, Richard, Individually, and as Special Administrator of Conti, Patricia (Estate of) | St. Clair County, IL | 20-L-63 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Conway, Thomas & Dorcas | Madison County, IL | 21-L-1012 | Maune Raichle Hartley French & Mudd, LLC | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Cook, Chris & Mary | Madison County, IL | 20-L-874 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Cooney, Tina | Middlesex County, NJ | MID-L-2992-22AS | Maune Raichle Hartley French & Mudd, LLC | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Cooper, Frederick E Jr. | Philadelphia Court of Common Pleas, PA | 221200021 | Maune Raichle Hartley French & Mudd, LLC | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Cooper, Lilo and Cooper, Leslie | County of Los Angeles, CA | 23STCV15823 | The Law Office of Worthington and Caron, P.C. | 273 W. 7th Street San Pedro, CA 90731 |
| Cormier, Lonnie | St. Clair County, IL | 20-L-658 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Corum, Scott and Greta | Middlesex County, NJ | MID-L-001294-22AS | Levy Konigsberg, LLP | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Costello, Margaret, Individually, and as Special Administrator of Costello, Timothy (Estate of) | St. Clair County, IL | 19-L-377 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Crosby, David as Executor of the Estate of Mary Crosby | Steuben County, NY | E2022-0467CV | Maune Raichle Hartley French & Mudd, LLC | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Cross, M., Margaret | County of New York, NY | 190155/2023 | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Crowder, Howard (Sr.), Howard (Jr.) & and Barbara (Estate of) | Twenty Second Judicial Circuit, City of St. Louis, MO | 1922CC11645 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Dancy, Lathan & June | St. Clair County, IL | 19-L-851 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Danz, Lillian | Cook, IL | 2022L005591 | Maune Raichle Hartley French & Mudd, LLC | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Deal, Michael & Christine | Middlesex County, NJ | MIDL00055122 | Levy Konigsberg, LLP | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Degannett, Paul & Mary | Middlesex County, NJ | MID-L-179-22AS | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Dellinger, John | Madison County, IL | 19-L-307 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Delucia, Gail | Middlesex County, NJ | MID-L-001858-23AS | Maune Raichle Hartley French & Mudd, LLC | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Deng, Jian Kang and Li Ying | County of New York, NY | 190114/2023 | Meirowitz & Wasserberg, LLP | 1040 Sixth Avenue, Suite 12B New York, NY 10018 |

| Claimant Name | Jurisdiction | Docket No./Case No. | Plaintiff's Counsel | Plaintiff's Counsel Mailing Address |
|--|--|----------------------|--|---|
| Deroo, Nicole | Middlesex County, NJ | MID-L-00196-22 | Simmons Hanly Conroy, LLC | 1 Court St Alton, IL 62002 |
| Deorzi, Rudolph & Deborah | St. Clair County, IL | 19-L-874 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Diaz, Jill, Individually and as Successor-in-interest to Pardo, Teresa Deceased; Pardo, Michael; Stanley, Joni and Pardo, Darren | County of Los Angeles, CA | 23STCV08409 | Maune Raichle Hartley French & Mudd, LLC | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Dibello, Audra and James Gay | Middlesex County, NJ | MID-L-1282-23AS | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Dickerson, Martha, Individually, and as Special Administrator of Dickerson, Jerry (Estate of) | St. Clair County, IL | 20-L-156 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Dobson, Jeffery & Janese | Madison County, IL | 19-L-1626 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Dotson, Ronald & Rosita | Middlesex County, NJ | MID-L-005986-21 | Levy Konigsberg, LLP | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Downing, Robert & Linda | Madison County, IL | 20-L-1282 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Dudte, Robert & Nancy | Madison County, IL | 20-L-1179 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Duncan, Anna | St. Clair County, IL | 20-L-180 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Echum, Gabriel & Celina | Madison County, IL | 19-L-1390 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Egert, Lewis as Personal Representative of the Estate of Ilene G. Egert, and Lewis Egert, Individually | County of New York, NY | 190204/2021 | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| El-Abbasi, Mohmmad, On His Own Behalf and on the Behalf of All other Satutory Beneficiaries of Patricia Anne El-Abbasi | Maricopa County, AZ | CV2023-013113 | Ely, Betti, Ulman, Rosenblatt & Ozer | 3200 N. Central Ave. Suite 1930 Phoenix, AZ 85012 |
| Elmer, Denise | Middlesex County, NJ | MID-L-0656-23 AS | Cohen, Placitella & Roth, P.C. | 127 Maple Avenue Red Bank, NJ 7701 |
| Elmer, Robert | Oswego, NY | ECF-2022-0597 | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Emmens, Michael and Teresa | Multnomah County Circuit Court, OR | 22CV21025 | Maune Raichle Hartley French & Mudd, LLC | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Esqueda, Guillerma C. and Roberto Esqueda, h/w | Middlesex County, NJ | MID-L-001887-22AS | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Estrella, Joseph & Patricia | Madison County, IL | 20-L-205 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Farris, Diane (Estate of John Gallo) | United States District Court for the Southern District of New York, NY | 1:23-cv-02023-LAK-SN | Simon Greenstone Panatier, P.C. | 1201 Elm Street, Suite 3400 Dallas, TX 75270 |
| Faz, Rolando & Araceli | Madison County, IL | 20-L-560 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Fedlerman, Ernie, Individually and as Special Administrator of Felderman, Janice (Estate of) | Madison County, IL | 20-L-1832 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Feldman-Nagel, Sharon and Christopher Nagel | County of New York, NY | 190191/22 | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Ferreira, Joseph & Stephanie | Philadelphia Court of Common Pleas, PA | 2112-01875 | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Fields, Michael S. (Lora M. Howard) | Madison County, IL | 20-L-0447 | Maune Raichle Hartley French & Mudd, LLC | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Filip, Sharon & John | County of New York, NY | EFCA2022001356 | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |

| Claimant Name | Jurisdiction | Docket No./Case No. | Plaintiff's Counsel | Plaintiff's Counsel Mailing Address |
|---|---|-------------------------|--|---|
| Fillingim, Julia, Individually & as Special Administrator of the Estate of Baxter, Marianne | Middlesex County, NJ | MID-L-005085-23 | Motley Rice LLC | 40 Westminster St., 5th Floor Providence, RI 2903 |
| Finch, Frank and Ruth | Middlesex County, NJ | MID-L-005051-22 | Maune Raichle Hartley French & Mudd, LLC | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Fleemin, Joanne & John | Broward County, FL | CACE2102220327 | Flint Law Firm | 3838 Oak Lawn Avenue, Suite 1000 Dallas, TX 75219 |
| Flynn, Michael Brian | St. Clair County, IL | 19-L-615 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Foster, Richard | St. Clair County, IL | 19-L-401 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Frissora, Annette | Middlesex County, NJ | MID-L-4867-21AS | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Galan, Melvin & Louise | County of New York, NY | 1902872020 | Levy Konigsberg, LLP | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Gallardo, Jose & Maria DeLourdes Gonzalez | County of Los Angeles Superior Court, CA | BC671452 | Deblase Brown Eyerly | 680 South Santa Fe Ave. Los Angeles, CA 90021 |
| Galleciez, Kathleen | Madison County, IL | 22-LA-0115 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Galvan, Juan | Madison County, IL | 20-L-218 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Garces, Laura | County of Alameda, CA | 23CV032898 | Simon Greenstone Pantier, P.C. | 1201 Elm Street, Suite 3400 Dallas, TX 75270 |
| Garnes, Rosa & David | Jefferson County Supreme Court, NY | EF2022-00000051 | Levy Konigsberg, LLP | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Garza, Jorge | Middlesex County, NJ | MID-L-3299-21AS | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Gee, Margaret | County of New York, NY | 190076/2023 | Simon Greenstone Pantier, P.C. | 1201 Elm Street, Suite 3400 Dallas, TX 75270 |
| Gibbs, Elaine and Gibbs, John | County of New York, NY | 190221/2023 | Simon Greenstone Pantier, PC | 1201 Elm Street, Suite 3400 Dallas, TX 75270 |
| Gilbride, Ellyn | Middlesex County, NJ | MID-L-002848- 21AS | Levy Konigsberg, LLP | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Goerg, Deborah, Individually, and as Special Administrator of Goerg, Carol (Estate of) | Madison County, IL | 20-L-1385 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Golden, Gayle, Individually, and as Special Administrator of Golden, Robert (Estate of) | Madison County, IL | 19-L-1654 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Gomez, Alfredo Jr. and Herlinda | Dona Ana County, NM | D-307-CV-2023- 01077 | Simon Greenstone Pantier, P.C. | 1201 Elm Street, Suite 3400 Dallas, TX 75270 |
| Goodman, Neil (Estate of) & Paula | St. Clair County, IL | 19-L-673 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Graham, Scott Allen as Personal Representative of the Estate of Patricia Ann Graham | County of New York, NY | 190072/2021 | Karst and Von Oiste, LLP | 505 Main Street Port Jefferson, NY 11777 |
| Gray, Juliet and Kyle | Middlesex County, NJ | MID-L-000513-23- AS | Maune Raichle Hartley French & Mudd, LLC | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Gray, Kim | Middlesex County, NJ | MID-L-5932-19AS | Levy Konigsberg, LLP | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Gray, Stanley | Madison County, IL | 20-L-329 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Griffith, Richard and Dee | Middlesex County, NJ | MID-L-154-23-AS | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |

| Claimant Name | Jurisdiction | Docket No./Case No. | Plaintiff's Counsel | Plaintiff's Counsel Mailing Address |
|--|---|---------------------|--|--|
| Grigoli, Salvatore and Grigoli, Vincenza | County of New York, NY | 190200/2023 | Levy Konigsberg, LLP | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Grimes-Love, Tony R. | Middlesex County, NJ | MID-L-001991-22AS | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Grohl, Marlin | Madison County, IL | 20-L-1105 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Grover, Gary & Brenda | Madison County, IL | 19-L-1743 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Gudenau, Nicole (Estate of Deborah Iezzi) | Middlesex County, NJ | MID-L-4147-22 AS | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Gumpert, Esther | County of New York, NY | 190056/2022 | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Habib, Nagwa | Schenectady, NY | 2021-2381 | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Haines, Michael & Shirley | Madison County, IL | 19-L-1394 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Hall, Rod as Personal Representative of Estate of Jim Hall | Middlesex County, NJ | MID-L-001931-23 | Levy Konigsberg, LLP | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Hallam, Bernice | County of Los Angeles, CA | 23STCV11756 | Simon Greenstone Panatier, P.C. | 1201 Elm Street, Suite 3400 Dallas, TX 75270 |
| Hammond, Jane and Colin | County of New York, NY | 190162/2022 | Simon Greenstone Panatier, P.C. | 1201 Elm Street, Suite 3400 Dallas, TX 75270 |
| Hammonds, Gilbert & Venida | Twenty Second Judicial Circuit, City of St. Louis, MO | 2022-CC01082 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Haney, Kunigar | County of Los Angeles, CA | 23STCV06726 | Simon Greenstone Panatier, P.C. | 1201 Elm Street, Suite 3400 Dallas, TX 75270 |
| Hardin, Diana and Ronald | Middlesex County, NJ | MID-L-003834-22AS | Maune Raichle Hartley French & Mudd, LLC | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Harlow, Keith & Lisa | Madison County, IL | 20-L-162 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Harper, Meredith, As Trustee for the Next-of-Kin of Harper, Charlene | County of Ramsey, MN | 62-CV-23-2656 | Simon Greenstone Panatier, P.C. | 1201 Elm Street, Suite 3400 Dallas, TX 75270 |
| Harrington, Virginia | Middlesex County, NJ | MID-L-006733-20AS | Levy Konigsberg, LLP | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Harris, Kimberly & Michael | Middlesex County, NJ | MID-L-4711-21AS | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Harter, Robert | St. Clair County, IL | 20-L-0061 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Hartman, Robert & Karen | Middlesex County, NJ | MID-L-953-21AS | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Hatcher, Kimberly | Alameda County, CA | 22-CV-021209 | Simmons Hanly Conroy, LLC | 1 Court St Alton, IL 62002 |
| Hathaway, Todd & Fayda | Erie County, NY | 800575/2023 | Lipsitz & Ponterio & Comerford, LLC | 1201 Elm Street, Suite 3400 Dallas, TX 75270 |
| Haynes, Charles | Madison County, IL | 21-L-1301 | Maune Raichle Hartley French & Mudd, LLC | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Herman, Elaine Adelia Hickey and Jacob Russell Herman Sr. | County of Los Angeles, CA | 22STCV32540 | Dean Omar Branham Shirley, LLP | 302 N Market Street, Suite 300 Dallas, TX 75202 |

| Claimant Name | Jurisdiction | Docket No./Case No. | Plaintiff's Counsel | Plaintiff's Counsel Mailing Address |
|---|---|---------------------|---|--|
| Herman, Hickey, Adelia and Herman Sr., Jacob Russell | Fairfield County, CT | FBT-CV23-6124687-S | Early, Lucarelli, Sweeney & Meisenkothen, LLC | 360 Lexington Ave., 20th Floor New York, NY 10017 |
| Hill, Salena | Madison County, IL | 21-L-0019 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Hillman-Villari, Ana | Madison County, IL | 23 MR 000080 | Maune Raichle Hartley French & Mudd, LLC | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Hinkle, Sandra | Philadelphia County, PA | 230401956 | Maune Raichle Hartley French & Mudd, LLC | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Hintz, R. Christopher (Estate of Robert T. Hintz). | Alameda, CA | 23CV040426 | Maune Raichle Hartley French & Mudd, LLC | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Hoffman, Joyce | Middlesex County, NJ | MID-L-00407-22AS | Maune Raichle Hartley French & Mudd, LLC | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Hoffman, Vanessa | Middlesex County, NJ | MID-L-3244-21AS | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Hofmaister, Sharon | County of Los Angeles, CA | 23CV033743 | Kazan, McClain, Satterley & Greenwood | 55 Harrison St. Suite 400 Oakland, CA 94607 |
| HoHing, Winnette | Middlesex County, NJ | MID L-2758-23 AS | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Holtermann, Alison, Administratrix of Holterman, Patrice | County of New York, NY | 19005821 | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Horanyi, Tanya | Middlesex County, NJ | MID-L-001859-23AS | Maune Raichle Hartley French & Mudd, LLC | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Hunt, Jimmie, Individually, and as Special Administrator of Hunt, Louise (Estate of) | St. Clair County, IL | 20-L-481 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Hutchings, Catherine | County of New York, NY | 190115/2023 | Simon Greenstone Panatier, P.C. | 1201 Elm Street, Suite 3400 Dallas, TX 75270 |
| Hyrkas, Wendy | Twenty Second Judicial Circuit, City of St. Louis, MO | 2022-CC10606 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Iacovangelo Jean, Iacovangelo, Frank | Monroe County, NY | E2023005779 | Levy Konigsberg, LLP | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Ingram, Jody | Madison County, IL | 2019-L-001751 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Jackson, Alvin & Dana | St. Clair County, IL | 20-L-283 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Jackson, Jo, Individually, and as Special Administrator of Jackson, Ricky (Estate of) | Madison County, IL | 20-L-617 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Jacoby, Lisa & William | County of New York, NY | 190174/21 | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Jimenez, Lola & Robert | St. Clair County, IL | 19-L-824 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Kachermeyer, Donald & Teresa | St. Clair County, IL | 20-L-129 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Kalpakoff, Deborah and Steve | County of Los Angeles, CA | 22STCV33326 | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Keshavarz-Joud, Amir and Farzi Somali, H/W | Middlesex County, NJ | MID-L-001409-22AS | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Kincaid, Donnita and Michael | Madison County, IL | 22-LA-0090 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| King, Rachael | Madison County, IL | 22-LA-0646 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |

| Claimant Name | Jurisdiction | Docket No./Case No. | Plaintiff's Counsel | Plaintiff's Counsel Mailing Address |
|--|----------------------------|---------------------|---|---|
| Kirschner, Melanie | Ulster County, NY | EF2023-1417 | Belluck and Fox Law Firm | 546 5th Ave, 5th Floor New York, NY 10036 |
| Kirschner, Melanie and Kirschner, Spencer | Ulster County, NY | EF2023-1417 | Belluck and Fox Law Firm | 546 5th Ave, 5th Floor New York, NY 10036 |
| Knippers, Douglas (Estate of) & Warren | St. Clair County, IL | 19-L-632 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Kopp, Christine, Individually and as Personal Representative of Kopp, John (Estate of) | Suffolk, NY | 609596/20 | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Kucharski. S., Robert and Kucharski, Cher | Erie County, NY | 809856/2023 | Lipsitz, Ponterio & Comerford, LLC | 424 Main Street, Suite 1500 Buffalo, NY 14202 |
| Kursh, Gail & Primor, Zev | County of New York, NY | 190280/2022 | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Laine, Gherud & Tracy | Circuit Court of Brown, WI | 021CV001269 | Hale, Skemp, Hanson, Skemp & Sleik; | 505 King Street, Suite 300 La Crosse, WI 54601 |
| LaSalle, Jack and Dianne | King County, WA | 23-2-08165-0 SEA | Schroeter, Goldmark & Bender | 401 Union Street, Suite 3400 Seattle, WA 98101 |
| Lawrence, Nancy (WD John) | County of Los Angeles, CA | 22STCV15173 | Simon Greenstone Panatier, P.C. | 1201 Elm Street, Suite 3400 Dallas, TX 75270 |
| Lawson, David | St. Clair County, IL | 20-L-104 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Leblanc, Lynda and James | County of Los Angeles, CA | 22STCV35792 | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Lee, P. Michaelleen | Allegheny County, PA | 23-008055 | The Law Offices of Kapusta & Schweers LLC | 445 Fort Pitt Blvd, #500 Pittsburgh, PA 15219 |
| Letizia, Joseph and Donna | Middlesex County, NJ | MID-L-002232-22AS | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Liackos, Stephen | Madison County, IL | 22-LA--0248 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Libell, Nelson | Madison County, IL | 20-L-1020 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Linscott, William | St. Clair County, IL | 19-L-884 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Little, B. Christopher | Middlesex County, NJ | MID-L-003868 | WEITZ & LUXENBERG, P.C. | 700 Broadway New York, NY 10003 |
| Lodovico, Cynthia | Middlesex County, NJ | MID-L-1418AS | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Lorenzo, Elizabeth f/e/o Richard | Middlesex County, NJ | MID-L-001187-22AS | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Lozano, Marie T | County of Los Angeles | 23STCV16061 | Dean Omar Branham Shirley, LLP | 302 N Market Street, Suite 300 Dallas, TX 75202 |
| Lyman, John | St. Clair County, IL | 20-L-170 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Macron, Marilyn | County of New York, NY | 190214/2023 | Simon Greenstone Panatier, P.C. | 1201 Elm Street, Suite 3400 Dallas, TX 75270 |
| Maetten, Theodore and Suzzann | St. Louis County, MO | 21SL-CC02616 | SWMW Law LLC | 701 Market Street, Suite 1000 St. Louis, MO 63101 |
| Mager, Jennifer and Mandracchia, John | Los Angeles, County, CA | 235TCV09956 | Frost Law Firm PC | 273 W 7th Street San Pedro, CA 90731 |
| Martinez, Mary and Michael | Broward County, FL | 22-018794 CA27 | Dean Omar Branham Shirley, LLP | 302 N Market Street, Suite 300 Dallas, TX 75202 |

| Claimant Name | Jurisdiction | Docket No./Case No. | Plaintiff's Counsel | Plaintiff's Counsel Mailing Address |
|--|--|----------------------|--|--|
| Masterson, Leo and Masterson, Lori | County of New York, NY | 190172/2023 | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Maute, Tucker and Munizza, Olivia | Broward County, FL | CACE-22-008500 | Maune Raichle Hartley French & Mudd, LLC | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Maynard, James, Individually and as Executor of the Estate of Orloff, John, deceased | Middlesex County, NJ | MID-L-4578-21 | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Mazzarella, Chris (Estate of) | St. Clair County, IL | 19-L-430 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| McDaniel, Rhonda, Individually and as Representative of McDaniel, Timmy (Estate of) and Jory McDaniel and Jeremy McDaniel | 11th Judicial District of Harris, TX | 202078991 | Simon Greenstone Pantier, P.C. | 1201 Elm Street, Suite 3400 Dallas, TX 75270 |
| McDonald, Stella | Silver Bow County, MT | DV-23-157 | Kovacich Snipes Johnson, P.C. | 21 3rd St. North, Suite 301 Great Falls, MT 59401 |
| McDonough, Colleen | Middlesex County, NJ | MID-L-001512-21AS | Levy Konigsberg, LLP | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| McGill, Dawna, Individually, and as Special Administrator of Jones, Jackie Lee (Estate of) | Madison County, IL | 20-L-1457 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| McGinnis, Tina (Bridget Burke) | Madison County, IL | 22-LA-0442 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| McKinney, Matthew and Alejandra | San Juan, NM | D-1116-CV-2022-00766 | Durham, Pittard & Spalding, LLP | P.O. Box 224626 Dallas, TX 75222 |
| McLean, Carretta, Individually, and as Special Administrator of McLean, Wilton (Estate of) | St. Clair County, IL | 20-L-183 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| McMahon, April and McMahon, Norman | New York, NY | 811407/2023 | Lipsitz & Ponterio and Simon Greenstone | 424 Main Street, Suite 1500 Buffalo, NY 14202 |
| Mead, Joann, Individually, and as Special Administrator of Mead, James (Estate of) | St. Clair County, IL | 19-L-895 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Meyer, Tommy and Carol | Middlesex County, NJ | MID-L-001860-23AS | Maune Raichle Hartley French & Mudd, LLC | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Michel, Louis | Madison County, IL | 20-L-1648 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Miller, Ann & Jeffrey | Middlesex County, NJ | MID-L-271021-AS | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Mize, William & Dillie | Philadelphia Court of Common Pleas, PA | 2205-1903 | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Mokhtarian, Golshan, Individually and as Personal Rep of Abnar Ashirzadeh, Deceased and Jaklin Yazdi, Katrin Ashir and Matthew Ashir, Individually | County of Los Angeles, CA | 22STCV30817 | Simon Greenstone Pantier, P.C. | 1201 Elm Street, Suite 3400 Dallas, TX 75270 |
| Moreno, Amelia | Middlesex County, NJ | MID-L-003387-22 | Maune Raichle Hartley French & Mudd, LLC | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Morgan, Rose June | Middlesex County, NJ | MID-L-003282-23 | Maune Raichle Hartley French & Mudd, LLC | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Mota, Maritza | Middlesex County, NJ | MID-L-005753-21 | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Mukomela, Gwendolyn, Individually and as Special Admin for Kenneth Mukomela, Deceased | Madison County, IL | 22-LA-0962 | Maune Raichle Hartley French & Mudd, LLC | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Mundell, Maria, Individually, and as Special Administrator of Mundell, Henry (Estate of) | St. Clair County, IL | 19-L-909 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Murphy, John & Janice | St. Clair County, IL | 20-L-514 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |

| Claimant Name | Jurisdiction | Docket No./Case No. | Plaintiff's Counsel | Plaintiff's Counsel Mailing Address |
|--|-----------------------------|---------------------|---|--|
| Myers, James | Ernie County, NY | 804123/2023 | Simon Greenstone Panatier, P.C. | 1201 Elm Street, Suite 3400 Dallas, TX 75270 |
| Nally, Thomas and Nally, Louise | Middlesex County, MA | 23-1200 | Shepard Law Firm | 160 Federal Street Boston, MA 2110 |
| Nasr, Yehia and Deborah | County of New York, NY | 190066/2023 | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Nathan, Fraida (Deceased) & Yochanan | Middlesex County, NJ | MID-L-006101-21 | Levy Konigsberg, LLP | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Nelson, Sarahsue | Middlesex County, NJ | MIDL102222AS | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Nichols, Gerald & Darlene | Madison County, IL | 20-L-55 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Nicholson, Nathan, Personal Representative of Nicholson, Harold (Estate of) | Middlesex County, NJ | MID-L-4402-21AS | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Nutt, Charles & Denise | Middlesex County, MA | 2281CV02455 | Duffy Law, LLC | 70 Washington Street, Suite 405 Salem, MA 1970 |
| Ochoa, Gabriel | Dona Ana County, NM | D-307-CV-2023-01125 | Durham, Pittard & Spalding, LLP | P.O. Box 224626 Dallas, TX 75222 |
| Odom, Charles | Middlesex County, NJ | MID-L-4851-21AS | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Olson, Robert | Madison County, IL | 20-L-1594 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| O'Reilly, Kieran | Cork, Ireland | Unknown | Coleman Legal Partners | 84 Talbot St 0, 0 0 |
| Ortiz, Johanna, Individually and as Successor-in-Interest to Perez, Maria Elena (Decedent) | County of Los Angeles, CA | 23STCV14552 | Simmons Hanly Conroy, LLC | 1 Court St Alton, IL 62002 |
| Pallotta, Josephine and Pallotta, James | Middlesex County, NJ | MID-L-003512-23 | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Parvin, Janice | Middlesex County, NJ | MID-L-3126-22 | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Pelley, Stephanie (Parent, Guardian Next Friend Minor Children) | Middlesex County, MA | 2381CV00473 | Dean Omar Branham Shirley, LLP | 302 N Market Street, Suite 300 Dallas, TX 75202 |
| Pena, Jacklyn | Middlesex County, NJ | MID-L-2573-22 | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Peoples, Monica | St. Clair County, IL | 20-L-103 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Perl, Rosemarie | County of New York, NY | 190087-2021 | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Perry, L. Michael and Long, L. Lonnie | Richland County, SC | 2023CP4004072 | Kassel McVey Attorneys at Law | 1330 Laurel Street P.O. Box 1476 Columbia, SC 29202 |
| Phelan, Marlene Theresa | Fairfield at Bridgeport, CT | | Early, Lucarelli, Sweeney & Meisenkothen, LLC | 360 Lexington Ave., 20th Floor New York, NY 10017 |
| Phillips, Patricia | County of New York, NY | 190111/2023 | Simon Greenstone Panatier, P.C. | 1201 Elm Street, Suite 3400 Dallas, TX 75270 |
| Pickering, Michelle | County of Los Angeles, CA | 23STCV19273 | Simon Greestone Panatier, PC | 1201 Elm Street, Suite 3400 Dallas, TX 75270 |
| Pidge, Raymond f/e/o Pamela K | Middlesex County, NJ | MID-L-001407-22AS | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Poland-Stemock, DeAnna, Individually and as Executor of BOLEN, Barbara (Estate of) | Middlesex County, NJ | MID-L-404-22-AS | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Poulton, Catherine and David | County of New York, NY | 190094/2022 | Maune Raichle Hartley French & Mudd, LLC | 1015 Locust, Suite 1200 St. Louis, MO 63101 |

| Claimant Name | Jurisdiction | Docket No./Case No. | Plaintiff's Counsel | Plaintiff's Counsel Mailing Address |
|--|---|---------------------|---|---|
| Pream, Tamara & Francis | Madison County, IL | 2022LA001068 | Maune Raichle Hartley French & Mudd, LLC | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Przekop, Charles & Delphine | Middlesex County, NJ | MID-L-003328-21AS | Maune Raichle Hartley French & Mudd, LLC | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Raschka, Julia et al., as the surviving heirs of Raschka, David, deceased | Twenty Second Judicial Circuit, City of St. Louis, MO | 1922CC12252 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Renwick, Joyce and Slom, Samuel | Miami-Dade County, FL | 23-011345-CA-01 | Dean Omar Branham Shirley, LLP | 302 N Market Street, Suite 300 Dallas, TX 75202 |
| Reyes, Joel and Vaselaar | Allegheny County, PA | GD-23-008144 | Meirowitz & Wasserberg, LLP | 1040 Sixth Avenue, Suite 12B New York, NY 10018 |
| Reyes-Vasquez, Jose and Romona | County of New York, NY | 190216/2021 | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Rhoades, Bonnie and Rhoades, James W | Cook County, IL | 2023L008925 | Maune Raichle Hartley French & Mudd, LLC | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Richardson, Phillip and Larry Eroh | Philadelphia County, PA | 230303073 | Meirowitz & Wasserberg, LLP | 1040 Sixth Avenue, Suite 12B New York, NY 10018 |
| Rikkola, James E. and Rikkola, Barbara J. | Madison County, IL | 2023LA001060 | Maune Raichle Hartley French & Mudd, LLC | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Robinson, Jeanne | County of Los Angeles, CA | 23STCV15780 | The Law Office of Worthington and Caron, P.C. | 273 W. 7th Street San Pedro, CA 90731 |
| Rodriguez, Jose and Carmen | Middlesex County, NJ | MID-L-005536-22 | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Rollman, Greg | Middlesex County, NJ | MID-L-20722AS | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Romahn, Audrey | Philadelphia Court of Common Pleas, PA | 211201513 | Simon Greenstone Panatier, P.C. | 1201 Elm Street, Suite 3400 Dallas, TX 75270 |
| Rosales, Rozella | New York, NY | 190189-23 | Simon Greenstone Panatier, P.C. | 1201 Elm Street, Suite 3400 Dallas, TX 75270 |
| Rosas, Silvia V., Individually & as Successor in Interes to Olilia R. Rosas, et al | County of Los Angeles, CA | 23STCV21311 | Frost Law Firm, P.C. | 273 W 7th Street San Pedro, CA 90731 |
| Saams, Lucinda | Middlesex County, NJ | MID -L-1562 23 AS | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Salem, Jennifer and Jamal | County of New York, NY | 190224/2022 | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Santanta, Alberto and Yesenia | County of Los Angeles, CA | 23STCV11688 | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Schaefer, Nancy | Middlesex County, NJ | MID-L-007018-21AS | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Schlagel, Mark | Madison County, IL | 19-L-1733 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Schmidt, Grace | County of Los Angeles | 23STCV18513 | Simon Greenstone Panatier, P.C. | 1201 Elm Street, Suite 3400 Dallas, TX 75270 |
| Schultz, Beth | County of New York, NY | 190179/2021 | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Sellman, Alison | Middlesex County, NJ | MID-L-3809-22 | Maune Raichle Hartley French & Mudd, LLC | 1015 Locust, Suite 1200 St. Louis, MO 63101 |

| Claimant Name | Jurisdiction | Docket No./Case No. | Plaintiff's Counsel | Plaintiff's Counsel Mailing Address |
|--|------------------------|---------------------|--|--|
| Settle, Kimberly, Individually, and as Special Administrator of NELSON, Jeanne (Estate of) | Madison County, IL | 20-L-333 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Shakour, Farghaly & Emily | County of New York, NY | 190097/2022 | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Sherman, Michelle & Jeremy | Tompkins, NY | EF2022-0112 | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Siebert, Jane Beverly | Multnomah County, OR | 23CV2279 | Nelson MacNeil Rayfield Trial Attorneys PC | 421 Water Ave NE #4200 Albany, OR 97321 |
| Sifuentes, Wilfredo and Carmen | Middlesex County, NJ | MID-L-2779-22AS | Levy Konigsberg, LLP | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Simmons, Manijeh | Bexar County, TX | 2022-CI-3440 | Simon Greenstone Pantier, P.C. | 1201 Elm Street, Suite 3400 Dallas, TX 75270 |
| Small, DeAnna | Middlesex County, NJ | MID-L-002915-23 | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Smee, Lesley and Smee, Graham | Broward County, FL | 23-017696CA 27 | Rebecca S. Vinocur, P.A. | 5915 Ponce De Leon Boulevard, Ste. 14 Coral Gables, FL 33146 |
| Smith, Audrey L., Smith Marwin L., R.S. Minor Child | Cuyahoga, OH | CV23985434 | McDermott & Hickey LLC | 20525 Center Ridge Rd., #200 Rocky River, OH 44116 |
| Smith, Margie & Chester | Madison County, IL | 20-L-1256 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Sniegocki, Joseph and Robbin | Broward County, FL | CACE-23-010939 | Maune Raichle Hartley French & Mudd, LLC | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Sorum, Mark James and Barbara | Alameda County, CA | 23CV031203 | Kazan, McClain, Satterley & Greenwood | 55 Harrison St. Suite 400 Oakland, CA 94607 |
| Spayd, George Jr. | Allegheny County, PA | 23-010209 | The Law Office of Kapusta & Schweers, LLC | 445 Fort Pitt Blvd, #500 Pittsburgh, PA 15219 |
| Speweik, Susan, Individually, and as Special Administrator of Speweik, Donald Sr., (Estate of) | Madison County, IL | 20-L-534 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Spiegelman, Sheldon & Sandra | County of New York, NY | 1901492021 | Lanier Law Firm | 10940 W. Sam Houston Pky N, Suite 100 Houston, TX 77064 |
| Spingarn, Michael & Sandra | Westchester, NY | 56025/2022 | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| St. John, Tanga, Individually, and as Special Administrator of Campbell, Janice (Estate of) | St. Clair County, IL | 20-L-262 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| St. Onge, Valerie and Richard | Middlesex County, MA | 23-0546 | Law offices of Michael P. Joyce, P.C. | One International Place, Suite 840 Boston, MA 2110 |
| Stengel, Robert | County of New York, NY | 190212/21 | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Stevens, Patricia and W. | Middlesex County, NJ | MID-L-002979 | Maune Raichle Hartley French & Mudd, LLC | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Stone, Nicole and Joshua, h/w | Middlesex County, NJ | MID-L-001972-22AS | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Stringfellow, Thomas & Karen | Middlesex County, NJ | MID-L-002906-21AS | Levy Konigsberg, LLP | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Strocko, Meg Amore & Jason | Monroe County, NY | E2022009993 | Belluck and Fox Law Firm | 546 5th Ave, 5th Floor New York, NY 10036 |
| Stuart, Charles & Janet | Madison County, IL | 20-L-1837 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |

| Claimant Name | Jurisdiction | Docket No./Case No. | Plaintiff's Counsel | Plaintiff's Counsel Mailing Address |
|--|---|---------------------|--|---|
| Stuck, Michele and Bannister, Jack, Individually and as Executors of the Estate of Rigby, Penelope, deceased | County of New York, NY | 190096/2022 | Simon Greenstone Panatier, P.C. | 1201 Elm Street, Suite 3400 Dallas, TX 75270 |
| Suedekum, Jeri Lynn, Individually and as Administratrix of Suedekum, Almon Lynn (Estate of) | Middlesex County, NJ | MID-L-1859-21AS | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Sullivan, Joan and George | Middlesex County, NJ | MID-L-1278-23AS | Maune Raichle Hartley French & Mudd, LLC | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Syed, Sadia | Middlesex County, NJ | MID-L-000462-23 | Levy Konigsberg, LLP | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Teffeteller, Jerry and Sharon | County of Los Angeles, CA | 23STCV07392 | Simon Greenstone Panatier, P.C. | 1201 Elm Street, Suite 3400 Dallas, TX 75270 |
| Teigland, Krista | Suffolk, NY | 6036412021 | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Temor, Roney & Diane | Twenty Second Judicial Circuit, City of St. Louis, MO | 1922CC12205 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Tishman, Carol | Middlesex County, NJ | MID-L-5500-21-AS | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Townsend, Michelle | Middlesex County, NJ | MID-L-002370-23 AS | Maune Raichle Hartley French & Mudd, LLC | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Treme, Arlene, Individually and as Special Administrator of Treme, Harold (Estate of) | St. Clair County, IL | 20-L-335 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Treml, James | Madison County, IL | 21-L-133 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Trott, Liliana (Estate of John F. Tuccori) | Madison County, IL | 22-LA-310 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Tucker, Tewonia (Vashti DeSaussure, Deceased) | Middlesex County, NJ | MID-L-005713-22 | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Uribarri, Peter and Uribarri, Ana | Middlesex County, NJ | MID-L-3279-23AS | Maune Raichle Hartley French & Mudd, LLC | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Valega, Walter & Rita | County of Los Angeles, CA | 21STCV46564 | Maune Raichle Hartley French & Mudd, LLC | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Vasquez, Jose Rexes & Ramona | County of New York, NY | 190216/21 | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Vaughn, Eugenia | Madison County, IL | 22-LA-254 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Ventura, Theresa | County of New York, NY | 190055/21 | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Vice, Leslie and Sylvia | Madison County, IL | 2022-LA-001394 | Maune Raichle Hartley French & Mudd, LLC | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Vyner, Myralynn | County of New York, NY | 190077/2023 | Simon Greenstone Panatier, P.C. | 1201 Elm Street, Suite 3400 Dallas, TX 75270 |
| Washburn, Billy & Beverly | Madison County, IL | 20-L-634 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Weaver, Scott & Teresa | Madison County, IL | 20-L-1071 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Weber, Mark, as Personal Representative of the Estate of Rhanda Weber (Deceased) | Broward County, FL | CACE23-016220 | Rebecca S. Vinocur, P.A. | 5915 Ponce De Leon Boulevard, Ste. 14 Coral Gables, FL 33146 |
| Werner, Fred | Twenty Second Judicial Circuit, City of St. Louis, MO | 2122-CC09037 | Dailey Law Firm, LLC | 230 S. Bemiston Ave., Suite 1470 St. Louis, MO 63105 |

| Claimant Name | Jurisdiction | Docket No./Case No. | Plaintiff's Counsel | Plaintiff's Counsel Mailing Address |
|--|---|---------------------|--|---|
| Westover, Barbara | Middlesex County, NJ | MID-L-003011-22AS | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Wewers, Tammie, Wewers, Travis | Middlesex County, NJ | MID-L-002885-23 | Maune Raichle Hartley French & Mudd, LLC | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Whittlesey, Connie, Individually, and as Special Administrator of Whittlesey, Yvonne, (Estate of) | St. Clair County, IL | 20-L-122 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Wilbanks, June & Richard | County of Los Angeles, CA | 22STCV02413 | Maune Raichle Hartley French & Mudd, LLC | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Willhems, Henricus | Middlesex County, NJ | MID-L-5697-22-2AS | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Williams, Candice | County of New York, NY | 190253/2021 | Lanier Law Firm | 10940 W. Sam Houston Pky N, Suite 100 Houston, TX 77064 |
| Williams, Teras | Harris County, TX | 202350984 | Simon Greenstone Pاناتier, P.C. | 1201 Elm Street, Suite 3400 Dallas, TX 75270 |
| Williamson, Stephen | Middlesex County, NJ | MID-L- 22AS | Levy Konigsberg, LLP | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Wilson, James | St. Clair County, IL | 19-L-943 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Winchester, Carrie and Matthew | Middlesex County, NJ | MID-L-3583-20AS | Simon Greenstone Pاناتier, P.C. | 1201 Elm Street, Suite 3400 Dallas, TX 75270 |
| Winiarski, Leonard (Estate of) & Jayce, Kristopher, Jason | Twenty Second Judicial Circuit, City of St. Louis, MO | 1922CC11609 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Wisniewski, Sonia | Middlesex County, NJ | MID-L-2224-21AS | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Wolgamott, Curtis & Elsie | St. Clair County, IL | 20-L-98 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Woznica, Wieslawa and Marek | Madison County, IL | 2023LA000210 | Flint Cooper, LLC | 3838 Oak Lawn Avenue, Suite 1000 Dallas, TX 75219 |
| Wright, Janell, Individually, and as Special Administrator of Wright, John (Estate of) | St. Clair County, IL | 20-L-184 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Yasick, Donald & Shirley | Madison County, IL | 20-L-343 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Yates, Wendy, as Personal Representative for Baran, William (Estate of) | Madison County, IL | 22-LA-84 | Maune Raichle Hartley French & Mudd, LLC | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Yates,Sisca & Christie | St. Clair County, IL | 20-L-369 | The Gori Law Firm, P.C. | 156 N Main St Edwardsville, IL 62025 |
| Yerks, Shelley and Yerks, Thomas | Alameda County, CA | 23-CV032102 | Kazan, McClain, Satterley & Greenwood | 55 Harrison St. Suite 400 Oakland, CA 94607 |
| Zachary, Julanda | County of New York, NY | 190095/2022 | Weitz & Luxenberg, P.C. | 700 Broadway New York, NY 10003 |
| Zane, David and Zane, Rachel | Broward County, FL | 23-013057CA27 | Simon Greenstone Pاناتier, P.C. | 1201 Elm Street, Suite 3400 Dallas, TX 75270 |
| Zenar, Rose (Carla Young, As Personal Representative and Personal Representative Ad Prosequendum of the Estate of) | Middlesex County, NJ | MID-L-000784-22 | Levy Konigsberg, LLP | 1015 Locust, Suite 1200 St. Louis, MO 63101 |
| Zois, Mary, individually and as Executrix of the Estate of George Zois, Deceased | Suffolk, NY | 603057/2022 | Simon Greenstone Pاناتier, P.C. | 1201 Elm Street, Suite 3400 Dallas, TX 75270 |